

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KISON PATEL,)	Case No. 15-C-8174
individually and on behalf of)	
a class of similarly situated people,)	Judge John Z. Lee
)	
Plaintiff,)	
)	
)	
v.)	
)	
AT&T SERVICES, INC. and ILLINOIS)	
BELL TELEPHONE COMPANY,)	
)	
Defendants.)	

**JOINT MOTION TO CONTINUE DEADLINE TO FILE A MOTION FOR
PRELIMINARY APPROVAL OF A CLASS-WIDE SETTLEMENT**

NOW COMES the Plaintiff Kison Patel (“Patel”) and the Defendants AT&T Services Inc. and Illinois Bell Telephone Company (collectively “AT&T”), and for their Joint Motion to Continue the Deadline to File a Motion for Preliminary Approval of a Class-Wide Settlement state as follows:

1. After engaging in discovery, Patel and AT&T entered into a preliminary agreement to settle this case on a class-wide basis, and documented that agreement in an initial term sheet.
2. Patel and AT&T informed the Court of their settlement at a status hearing on May 24. At that time, the Court entered an order which set the deadline for the parties to file a motion for preliminary approval of the final settlement agreement of June 24, with the motion to be presented at a hearing scheduled for June 29.
3. Since that initial conference, the parties have diligently pursued a final settlement agreement, including the drafting of a formal class-wide settlement agreement. That agreement,

if finally approved by this Court, would terminate this litigation as to the named Plaintiff and the proposed settlement class. However, certain issues regarding finalizing and documenting the settlement are still under final negotiation at this time.

4. The parties believe that extending the deadline to file a motion for preliminary approval for an additional 26 days, to July 20, will allow them sufficient time to complete negotiations, to finalize the proposed settlement agreement, and to move the Court for a full stay of the litigation pending this Court's ruling on the motion for preliminary approval.

5. The parties further request that the Court schedule a hearing during the week of July 25, 2016 to address the preliminary approval motion.

6. This motion is made in the interest of justice and not of delay.

WHEREFORE, the parties respectfully request that this Court enter an ORDER continuing the deadline for the parties to file a motion for preliminary approval until July 20, 2016, and scheduling a hearing during the week of July 25, 2016 to address the motion.

RESPECTFULLY SUBMITTED this 20th day of June, 2016

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Certificate of Service

I hereby certify that on June 20, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will automatically send e-mail notification of such filing to all attorneys of record in this action.

/s/ Kyle J. Steinmetz

Kyle J. Steinmetz